

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

PETER JAMES MONSON

**FILED UNDER SEAL PURSUANT TO
L.R. 49.1(c)(1)(G) and 18 U.S.C. § 3509(d)**

Case No. 20-MJ-932 (ECW)

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Matthew Vogel, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the United States Department of Justice, Federal Bureau of Investigation (FBI), and have been so employed since July 2010. I am currently assigned to the Minneapolis Division, Squad C-4 and the Minnesota Child Exploitation Task Force, where my investigative responsibilities include investigation of child sexual abuse and exploitation crimes such as production, possession, receipt, and distribution of child pornography. I have gained knowledge and experience through training at the FBI Academy, in service training, and everyday work in conducting these types of investigations. I have received training in the area of child pornography and child exploitation investigations and have reviewed numerous examples of child pornography as defined at 18 U.S.C. § 2256, in various forms of media, including computer media.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), and am empowered by 18 U.S.C §§ 3052 and 3107 to conduct investigations of, and to make arrests for, violations of federal criminal statutes.

PURPOSE OF AFFIDAVIT

3. I make this Affidavit in support of an Application for a Criminal Complaint charging PETER JAMES MONSON (DOB xx/xx/1982) a/k/a “Brian Lafev,” “Brianna,” “boopiful4you2,” “boobulance,” and “blafev” (hereinafter MONSON) with Production of Child Pornography and Attempted Production of Child Pornography pursuant to 18 U.S.C. § 2251(a) and (e) and Receipt and Attempted Receipt of Child Pornography pursuant to 18 U.S.C. § 2252(a)(2) and (b)(1). My investigation to date shows that the production of child pornography and attempted production of child pornography by MONSON took place in November and December 2019. MINOR B, who met MONSON through MINOR A, and MINOR C met MONSON through Snapchat. MONSON purported to be a minor girl “Brianna.” MONSON groomed MINORs B and C and eventually used, persuaded, and enticed them to send MONSON sexually-explicit images that constitute child pornography under 18 U.S.C. § 2256. MONSON also received sexually-explicit images from MINORs C and D.

4. Specifically, between on or about November 7, 2019 through on or about November 19, 2019, in the District of Minnesota and elsewhere, PETER JAMES MONSON attempted to and did employ, use, persuade, induce, entice, and coerce MINOR

B (DOB XX/XX/2005) to engage in sexually-explicit conduct for the purpose of producing a visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, and that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer. The aforementioned visual depiction is a computer file titled, chat~media_v4~2019-11-19-23-07-6UTC~crazyXXXXXX404~boopiful4you2~saved~62026e25-6c03-2deb-2c03-76f102d43a66~v4.mp4.¹ The file is a video approximately eight seconds in duration and depicts MINOR B masturbating. This conduct constitutes Count 1 of the Complaint.

5. Between on or about November 13, 2019 and on or about December 10, 2019, in the District of Minnesota and elsewhere, PETER JAMES MONSON attempted to and did employ, use, persuade, induce, entice, and coerce MINOR C (DOB XX/XX/2005) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, and that visual depiction was produced or

¹ I have partially redacted file names where they contain information which tends to identify a minor victim.

transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer. The aforementioned visual depiction is a computer file titled, chat~media_v4~2019-12-10-23-28-35UTC~XXXX_XXXX1048~boopiful4you2~saved~e11e4cbc-01af-99ee-4389-68b327add867~v4.mp4. The file is a video approximately eight seconds in duration and depicts MINOR C masturbating. This conduct constitutes Count 2 of the Complaint.

6. On or about December 1, 2019, in the District of Minnesota and elsewhere, PETER JAMES MONSON attempted to and did knowingly receive a visual depiction using a means or facility of interstate or foreign commerce, or which was shipped or transported in or affecting interstate or foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually-explicit conduct, and such visual depiction is of such conduct. The aforementioned visual depiction is a computer file titled, chat~media_v4~2019-12-01-10-10-54UTC~XXXXXXXXX0_0ii~boopiful4you2~saved~d5654ca3-9e56-47bc-ada5-ca6dc7107016~v4.mp4. The file is a video approximately ten seconds in duration and depicts an animal licking the vagina of MINOR D and was sent to MONSON by MINOR D at MONSON's request. This conduct constitutes Count 3 of the Complaint.

7. On or about December 10, 2019, in the District of Minnesota and elsewhere, PETER JAMES MONSON attempted to and did knowingly receive a visual depiction using a means or facility of interstate or foreign commerce, or which was shipped or

transported in or affecting interstate or foreign commerce, by any means including by computer, and the producing of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct. The aforementioned visual depiction is a computer file titled, chat~batched_media~2019-12-10-23-40-55UTC~XXX_XXX1048~boopiful4you2~saved~01a9ef8f-31fe-f675-cf6e-41001c17461e~v4. The file is a video approximately eight seconds in duration and depicts MINOR C masturbating. This conduct constitutes Count 4 of the Complaint.

8. The facts set forth in this Affidavit come from my personal observations, my training and experience, evidence gathered pursuant to search warrants and subpoenas, and information obtained from other agents and witnesses. Because this Affidavit is submitted for the limited purpose of securing a Criminal Complaint, it does not include every fact known to me or to other investigators.

PROBABLE CAUSE

BACKGROUND OF THE INVESTIGATION

9. This investigation started as the result of a Pennsylvania State Police investigation involving the online sexual exploitation of MINOR A. Evidence obtained by Pennsylvania State Police through subpoenas and a Pennsylvania search warrant for MINOR A's Snapchat account led to the identification of MINOR B, a 14-year-old girl. In or around early November 2019, MINOR B sent a Snapchat message to MINOR A about an individual who "[wa]s giving me his card number so we can spend as much as we want."

10. On or about January 28, 2020, a Pennsylvania State Police investigator identified and interviewed MINOR B, a resident of Pennsylvania. During the interview, MINOR B stated she had sent nude photographs and videos to between 50 and 100 men with whom she chatted on Snapchat and another mobile chat application. MINOR B told the men with whom she chatted that she was 14 years old. Some of the men asked to meet MINOR B. MINOR B saved some of these conversations on her phone and her Snapchat account. MINOR B discussed how she and MINOR A planned to use the PayPal account of MINOR A's "sugar daddy" to receive money from the men to whom she sent pictures.

11. During the interview, MINOR B disclosed she found a nude image of a family member on a Snapchat account with which she was familiar. The account—known to MINOR B as sexyspy—"shared nudes of a ton of people." MINOR B was familiar with some of the people depicted in the images and knew them to be minors.

12. Pennsylvania State Police obtained a search warrant to search for child pornography and related evidence on MINOR B's cell phone. Troopers reviewed the contents of MINOR B's phone and observed that "sexyspy" was in fact a display name for the account ID boopiful4you2. My review of the Snapchat conversations² between

² The Snapchat application has several distinct types of messages available to users. Each type has a different retention period. Some communications, such as "Snaps," may be automatically deleted after both parties have viewed them, however either the sender or recipient may capture the Snap by taking a screenshot or using an outside application to capture the screen. "Chat" messages are retained for a longer time as are "Memories."

boopiful4you2 and MINOR B revealed boopiful4you2 made specific requests of MINOR B relating to sexual conduct and how to pose for images. These requests included directing MINOR B to produce sexually-explicit images and videos of MINOR B posing naked, masturbating, and engaging in sex acts with an unknown male.

13. According to subscriber and registration information provided by Snapchat, the ID boopiful4you2 was created on or about November 2, 2018. The display name is sexyspy. Login IP addresses on this account resolve to Internet service providers Comcast Communications and Verizon Wireless, which are geolocated in Minnesota.

14. I sent a subpoena to Comcast for subscriber information for an IP address used to access boopiful4you2 on or about November 24, 2019, and December 8, 2019. Comcast records show the subscriber was Person 1, an identified adult female at an identified address in Cottage Grove, Minnesota.

15. The subpoena to Verizon Wireless requested subscriber information for a series of IP addresses used to access boopiful4you2. Verizon Wireless records show the device assigned these IP addresses was assigned telephone number XXX-XXX-6442 and subscribed to by MONSON at the same Cottage Grove address.

16. Pennsylvania State Police obtained a search warrant for Snapchat account boopiful4you2. Snap, Inc.—the owner and operator of the Snapchat application—

For this reason, evidence found on a suspect or victim's phone may be different from records provided by Snap, Inc.

responded to the search warrant with more than 34,000 messages sent or received between on or about November 3, 2019, and January 31, 2020. The first messages on the account appeared related to restarting an account after a previous account—referred to as boopiful4you—was shut down by Snapchat. The user of this account appeared to be reconnecting with contacts from the previous account and reaching out to new contacts. The user appeared to be operating or moderating a controlled group or “private story,” which had a number of “nudes” posted. The user required people trying to access the group to send a personal “snap” to gain access to the “private story”.

17. The user—having adopted the persona of a 16-year-old girl “Brianna” from Minnesota (or sometimes Wisconsin)—contacted accounts apparently belonging to minor girls. Several conversations discussed the use of an application called Hoop, which allows Snapchat users to create searchable profiles to find others of similar age, location, and/or interests. “Brianna” sent messages to the effect of, “Send pics and I’ll rate ___/10. Nothing gets posted without your permission.” Another common message was, “Doing rates rn³ send sum fun.” “Brianna” had additional communications with some of the accounts, frequently writing messages such as, “You’re very pretty and sexy af⁴ too. Anything that shows off your sexy body more tho? Like a swimsuit or bra and panties? Nothing gets posted without your permission.” When girls seemed skeptical about the proposition,

³ An abbreviation for “right now.”

⁴ An abbreviation for “as fuck.”

“Brianna” sometimes wrote encouraging messages including, “Not nudes. When girls want nudes rated, I censor it for my story anyway.”

18. With certain accounts, “Brianna” attempted to recruit girls to be a “princess.” “Brianna” explained, “Ok so how it works is you pick a stripper name so no one knows who you are. I can give you suggestions. Then you pick your rules and how you want to add viewers to your story.” If the girl accepted, “Brianna” requested “send everything you have saved.” When asked about the purpose of the group, “Brianna” explained, “It’s for girls to safely show off and explore their bodies without constant harassment or dick pics from boys. It’s about building confidence and positive body image with positive feedback. I don’t send pics sent to me to anyone. I don’t send usernames...just girls.”

19. “Brianna” was aware of the ages of at least some of the girls contacted. When solicited for more revealing images, girls wrote, “Hehe I’m 15,” “I’m 13,” and, “I’m 14 so that would be child porn.” “Brianna” tried to assuage their concerns by reminding them that “Brianna” was 16.

20. “Brianna” demonstrated a certain patience in selecting and grooming potential victims. For example, when trying to get one 14-year-old girl to progress from clothed to more sexually-explicit pictures, the girl disclosed that she had been sexually assaulted by a family member. “Brianna” exchanged comforting messages with the girl, while at the same time suggesting to her that her feelings of guilt came from her secretly enjoying the assault. “Brianna” pressed the girl for graphic details about the assault and

while she discussed suicidal ideation, “Brianna” kept trying to recruit other girls for the group.

PRODUCTION OF CHILD PORNOGRAPHY INVOLVING MINOR B

21. According to information contained within Snapchat records, on or about November 7, 2019, “Brianna” contacted MINOR B on one of the girl’s Snapchat accounts, crazyXXXXX403. MINOR B was 14 years old at the time. “Brianna” used previously described lines requesting MINOR B send pictures to be rated and posted. In response, MINOR B sent an image of MINOR B posing naked with two fingers in her vagina. “Brianna” wrote, “That’s hot af.” “Brianna” requested that MINOR B send her additional images. On or about November 8, 2019, “Brianna” sent back to MINOR B one of MINOR B’s images with her chosen “stripper name” superimposed on it.

22. MINOR B then contacted “Brianna” on a second Snapchat account, crazyXXXXX404. “Brianna” requested “more pics and vids.” On or about November 12, 2019, in response to the instructions, MINOR B sent boopiful4you2 images and videos including a video file titled, chat~media_v4~2019-11-13-01-59-28UTC~crazyXXXXX404~boopiful4you2~saved~d98d4a3f-e9d0-7361-7cdd-83785a3688f6~v4.mp4. The file is a video approximately five seconds in duration which depicts MINOR B masturbating.

23. “Brianna” responded, “That’s a great booty. It’s a good start.” “Brianna” wrote, “Just take more pics and vids. Don’t try to hide your face or anything, but take sum when you’re changing or bathing or just feeling sexy or putting on lotion. The more light

the better. You can't take too many. Do sum panty changes or strip teases...and I don't judge. If you wanna go out to a farm and jerk off horses⁵ I'm just gonna say don't forget to save the vid." "Brianna" then asked MINOR B about her "kinky or taboo" interests.

24. By November 17, 2019, "Brianna" was directing MINOR B to "Take the pants off." Two days later, "Brianna" wrote, "I was gonna say you have a beautiful pussy you should rub that more." In response, on or about November 19, 2019, MINOR B sent a video file titled, chat~media_v4~2019-11-19-23-07-16UTC~crazyXXXXX404~boopiful4you2~saved~62026e25-6c03-2deb-2c03-76f102d43a66~v4.mp4. The video is approximately eight seconds of MINOR B masturbating.

25. As MONSON acting as "Brianna" progressed in grooming MINOR B, he asked about MINOR B interacting with a male: "What do you guys do when you fuck around?" He then suggested: "you would be the first princess to such⁶ a [d]ick⁷ on her story. Have him record it with your phone tho and it's up to you if you want to tell him what it's for. That would be so hot tho frfr⁸." After that, it appears that MINOR B stopped

⁵ I observed several times in this investigation when MONSON suggested to minor victims to engage in sexual contact with animals.

⁶ I believe this to be an apparent typographical error resulting in the misspelling of "suck."

⁷ Originally written with a typographical error as "sick," and later corrected in a subsequent message to "dick."

⁸ An abbreviation for "for real, for real."

responding to MONSON as “Brianna” via Snapchat. MONSON continued messaging MINOR B until at least December 1, 2019, without response. The messages largely consisted of MONSON sending screenshots of others asking for naked images of MINOR B.

PRODUCTION OF CHILD PORNOGRAPHY INVOLVING MINOR C

26. On or about November 13, 2019, boopiful4you2 contacted XXXX_XXXX1048. Subsequent investigation identified the Snapchat user of XXXX_XXXX1048 as MINOR C, date of birth XX/XX/2005.

27. MONSON—using the boopiful4you2 account—began the interaction by asking MINOR C to “send sum fun.” By November 17, 2019, MONSON again asked MINOR C to send images and requested, “anything that shows off your sexy body more tho...you’re sexy af. Just need a little less clothes on.” MINOR C then sent images and videos undressing and in various naked poses. MINOR C asked, “Do u need more removed in order for a rate??” MONSON replied, “Take them shorts off.”

28. As the conversation continued, MONSON gave MINOR C “pointers” on how to make better videos such as how to enhance lighting and focus. MONSON asked MINOR C if she had any “sex toys or fetishes.” MINOR C disclosed personal information, including plans for her fifteenth birthday party. MONSON also asked MINOR C about incest or any past sexual encounters.

29. Throughout early December 2019, MONSON and MINOR C discussed the establishment of MINOR C’s “private story” on MONSON’s account. They discussed how

many users would request access and how they would be admitted. MONSON wrote, “our story is gonna be soon love if you have anything to add... You’re at 26 [requests for access to the “private story”] so far. Just have to keep taking pics and vids love.”

30. On or about December 10, 2019, MINOR C sent MONSON a video titled, chat~media_v4~2019-12-10-23-28-35UTC~XXXX_XXXX1048~boopiful4you2~saved~e11e4cbc-01af-99ee-4389- 68b327add867~v4.mp4. The video is approximately eight seconds of MINOR C masturbating.

31. MONSON then wrote, “Maybe build up to these vids too love. Like do a vid stripping down to your panties. Then make a vid pulling the panties to the side and playing. Then pull them off all the way... You could do things like suck on your fingers then play with yourself or rubbing your pussy juice on your nipples and licking it off...”

32. On or about December 3, 2020, MINOR C was located and interviewed in Texas. MINOR C was interviewed by an FBI Child/Adolescent Forensic Interviewer (CAFI). MINOR C disclosed that she operated the Snapchat ID XXXX_XXXX1048. MINOR C recalled communicating with “Brianna” on Snapchat and that she had developed a connection with “Brianna” because MINOR C was going through a difficult time. “Brianna” was aware of MINOR C’s family problems. MINOR C told “Brianna” she loved her.

33. MINOR C recalled telling “Brianna” that she was 14 years old and that “Brianna” said she was 15 or 16. “Brianna” wanted MINOR C to send nude pictures, which MINOR C eventually did because she felt that “Brianna” loved her. MINOR C described

feeling pressured to be one of “Brianna’s” “princesses.” MINOR C recalled that “Brianna” provided instruction on how and what pictures to take. On at least one occasion, “Brianna” threatened to disseminate MINOR C’s nude images if MINOR C did not take pictures in a specific pose—in this case, on her hands and knees. MINOR C recalled that “Brianna” wanted MINOR C to take pictures with another minor. MINOR C then made up a story about a cousin to appease “Brianna.” MINOR C reported that she did not send images of her cousin.

34. MINOR C identified herself in several images found in the boopiful4you2 account records, including an image of her vagina which she took at “Brianna’s” direction. MINOR C reported that she was in Texas at the time the images were taken and sent to “Brianna.”

CHILD PORNOGRAPHY SENT TO MONSON BY MINOR D

35. On or about November 12, 2019, boopiful4you2 contacted XXXXXXXX0_0ii. Efforts to identify the Snapchat user of this account are ongoing. MONSON—using the boopiful4you2 account—asked Minor D to “send sum fun.” After MINOR D responded to MONSON’s initial messages, MONSON asked, “Take sum pics and show off that sexy body for a rate.” MINOR D replied, “I’m a young childdd.” MINOR D self-identified as being 13 years of age. MONSON, as 16-year-old “Brianna,” asked MINOR D to record herself while engaged in sexual contact with an animal. MINOR D apparently did so and sent a video titled, chat~media_v4~2019-12-01-10-10-54UTC~XXXXXXXXX0_0ii~boopiful4you2~saved~d5654ca3-9e56-47bc-ada5-

ca6dc7107016~v4.mp4. The video is approximately ten seconds of MINOR D in sexual contact with an animal. MONSON—as “Brianna”—confirmed receipt of the video by responding, “You should turn your sound on when you do vids. And that’s so hot.” “Brianna” then asked to “Rate and post” the video, but then wrote, “I was joking about posting the cat one.”

ADDITIONAL MINOR VICTIMS LIKELY

36. My review of Snapchat records obtained pursuant to search warrants is ongoing and reveals at least a dozen additional likely victims, including children who informed MONSON they were underage before or at about the same time MONSON directed them to produce and send sexually-explicit images. At least one self-reported 13-year-old girl whom MONSON directed to produce images depicting sexual contact with an animal did so and sent such images to MONSON. The FBI is in the process of identifying these minors. To date, the investigation has developed information placing these likely minors in locations around the United States as well as Canada, the United Kingdom, the Netherlands, and New Zealand.

ADDITIONAL INFORMATION ATTRIBUTING SNAPCHAT ACCOUNT OWNERSHIP TO MONSON

37. In my review of the Snapchat account boopiful4you2, I learned of a second or backup account boobulance. That account was created on or about May 11, 2019, from a Verizon Wireless IP address. The display name is Sexyspy Boopiful. Some of the login IPs used on both boopiful4you2 and boobulance are the same. For example, on or about December 11, 2019 at approximately 5:01:23 AM, boopiful4you2 logged in on IP address

174.219.129.135 (Verizon Wireless). The user logged out at approximately 5:03:48 AM. Moments later at approximately 5:04:00 AM, boobulance logged in on the same IP address and logged out approximately 90 seconds later. Boopiful4you2 then logged in again on the same IP seconds later at approximately 5:05:52 AM.

38. I also learned about other accounts created and controlled by MONSON such as boopiful4you, boopifully, and blafev. I applied for and was granted a search warrant for additional information associated with Snapchat accounts boopiful4you, boopiful4you2, boopifully, boobulance, and blafev in District of Minnesota case 20-MJ-272(BRT).

39. Subscriber records related to IPs used to access boopiful4you2 and boobulance revealed connection to a Verizon Wireless mobile device subscribed to by MONSON and a device connected to the Internet at the previously mentioned Cottage Grove residence.

40. On several occasions, the boopiful4you2 account sent out images inviting friends to “add” the boobulance account as a backup in case anything happened to boopiful4you2. Based on my review of the accounts, I believe the boobulance account was controlled by MONSON as a “backup” for the boopiful4you2 account.

41. Both booptiful4you2 and boobulance were in communication with Snapchat account blafev. Based on my review of the blafev account, I believe MONSON used the account posing as a 16-year-old boy. Some of these images sent as blafev appear to depict MONSON using digital filters, headwear, and other techniques to disguise his true age and appearance. For example, the pictures show an individual bearing a resemblance to images

posted on Twitter account @PrincessClitoris which appears to belong to MONSON. They are also consistent with pictures I have seen of MONSON found on other electronic devices seized from MONSON's residence.

42. The blafev account contained numerous videos depicting an adult male masturbating in rooms later observed to be in MONSON's Cottage Grove home. Some of these videos depict the male masturbating and ejaculating at/on the screen of an electronic device which appears to be displaying young girls' Snapchat pictures. The account also contained several "memories" consisting of apparent surreptitious video recordings showing Person 1 naked in her bedroom. Based on my review of the recordings, I believe MONSON recorded Person 1 while in their shared bedroom.

43. The xxx-xxx-6442 Verizon telephone number subscribed to by MONSON is associated with a Tango account in the name "Brian Lafevre." I believe that "Brianna" is the female persona of MONSON's "Brian" alias. Searches of public records revealed no evidence of "Brian Lafev," "Brian Lafevre," or "Brianna Lafevre" in the state of Minnesota.

44. On or about April 10, 2020, the FBI executed a search warrant (20-MJ-249 (ECW)) at MONSON's Cottage Grove, Minnesota residence. MONSON was present at the time the search began and declined to answer questions. MONSON left the residence and his current whereabouts are unknown.

45. Person 1 was also present and told agents that she and MONSON were in a committed relationship and lived at the house together for approximately five years. Person

1 and MONSON cared for three foster children, and Person 1 operated an in-home daycare which MONSON sometimes helped operate.

46. FBI agents located and seized an Apple iPhone assigned the telephone number ending in 6442 subscribed to by MONSON. The device contained evidence of use of the boobulance Snapchat account, the Hoop and Tango applications, an Internet browsing history indicating interest in incest, rape, and teen-themed pornography, and cloud data storage services such as Dropbox and mega.nz.

47. My initial review of the images and videos on the Apple iPhone revealed hundreds of screenshots or cached images which appear to be from the Snapchat application. These include images which appear to show the profile information for the boopiful4you2 account; images which appear to show the user-facing screen for an account with the display name Sexyspy; images with text referring to XXXX_XXXX1048; images which are visually similar to those found in the Snapchat records; sexually-explicit images of unidentified young girls consistent with activity observed in the Snapchat records; images showing profiles for user accounts which state the user is a minor; and numerous images with text indicating the senders are requesting access to the “private stories” of MONSON’s “princesses.”

48. I also found additional files on the phone including email accounts with MONSON’s name, photographs of MONSON, images from inside MONSON’s residence, text messages to and from MONSON, and other related evidence that MONSON was the

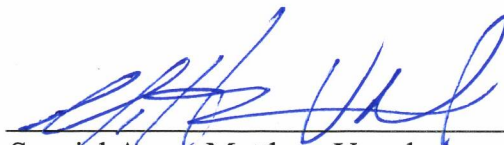
owner and user of the device. My review of the electronics seized from MONSON's residence is ongoing.

CONCLUSION

49. I therefore submit there is probable cause as charged in the proposed Criminal Complaint that PETER JAMES MONSON, in the District of Minnesota and elsewhere, attempted to and did, employ, use, persuade, induce, entice, and coerce minors to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted to him over the internet, all in violation of 18 U.S.C. § 2251(a) and (e).

50. I also submit there is probable cause as charged in the proposed Criminal Complaint that PETER JAMES MONSON, in the District of Minnesota and elsewhere, attempted to and did, knowingly receive visual depictions of minors engaged in sexually explicit conduct using a means or facility of interstate commerce, all in violation of 18 U.S.C. § 2252(a)(2) and (b)(1).

51. Accordingly, I request that a warrant be issued for the arrest of PETER JAMES MONSON.



Special Agent Matthew Vogel
United States Department of Justice
Federal Bureau of Investigation

SUBSCRIBED and SWORN before me
by reliable electronic means (Zoom and
email) pursuant to Fed. R. Crim. P. 41(d)(3)
on December 22, 2020



THE HONORABLE ELIZABETH COWAN WRIGHT
UNITED STATES MAGISTRATE JUDGE